



August 10, 2016

Dr. Tom Sinks
Office of the Science Advisor
Environmental Protection Agency
Sinks.tom@epa.gov

Re: Follow-up from our Meeting

Dear Dr. Sinks and Colleagues,

We greatly appreciated your time and the time of each of the other EPA staff who participated in our meeting on June 29, 2016.

Due to technical difficulties by phone, we have attached documents which provide information on the key examples that Miriam Rotkin-Ellman described by phone on ways in which EPA is not accounting for aggregate exposure as the science directs, or for early-life vulnerability and exposure. One example she highlighted is the fact that EPA's air office is currently using an outdated list of persistent, bioaccumulative toxicants to determine which chemicals it will include in its "multipathway risk assessment" (*i.e.*, for non-inhalation health risks). This list is an example of a document that could and should be easily updated based on current science. (*See* 2013 CRA Comments at 28-30, *available at* [regulations.gov](http://www.regulations.gov) as EPA-HQ-ORD-2013-0292-0133). In addition, EPA often does not add together multipathway and inhalation risks for carcinogens, even though the science is clear that carcinogenic risk is at least additive and should be summed. (As an example, please see pp. 37-40 of the reconsideration petition on EPA's refineries air toxics rule, *available at* [regulations.gov](http://www.regulations.gov) as EPA-HQ-OAR-2010-0682-0860). In addition to the examples that Miriam and Veena Singla highlighted in the meeting, Earthjustice's and NRDC's 2016 comments on the Human Risk Assessment Guidelines included and cited a list of key issues. (See attached).

We appreciated the chance to have a brief discussion on some pressing risk assessment matters before EPA that would benefit from up-to-date scientific advice from your office and from your colleagues. We welcome your follow up on any or all of these matters and would also be grateful for the chance to discuss with Dr. Burke as helpful and appropriate.

Please let us know if there is an opportunity to talk further with appropriate staff about the following or any other matters we discussed: (1) your office's follow-up on the guidelines dockets into which we submitted comments in June 2013 and March 2016; (2) any other work of your office in progress to update or inform the guidelines and protocols that program offices use to design and conduct human health risk assessments or evaluations; (3) the agency's effort

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in progress to implement risk assessment recommendations of the National Research Council (NAS 2009); and (4) the effort to implement the current science on risk and impacts assessment and evaluation as part of implementation of the newly amended TSCA. In connection with implementation of TSCA, we note that EPA is currently seeking public input on the processes it will use to prioritize and evaluate chemicals under TSCA, processes that will be incorporated into regulations that will be finalized within the next year. We hope that you will be involved in this effort. If there is an appropriate way to have a follow-up conversation on these issues as we highlighted them for you in our meeting, we would welcome your assistance in arranging that. We would also encourage EPA and the Risk Assessment Forum to increase public transparency on recommendations and actions you are working on in these areas, to allow external scientists, affected community members, and advocates to be able to offer input and scientific information that may be helpful to the agency.

Finally, we call your attention to an important new consensus statement on the strong need to protect children and pregnant women from toxic exposure, released July 1, 2016 by scientists from Project TENDR soon after our meeting. For more information, please see: <http://projecttendr.com>. We have attached that for your information. It was published in *Environmental Health Perspectives* and is available here: <http://ehp.niehs.nih.gov/EHP358>. This document reiterates many of the concerns we raised, and provides additional reason why our request for assistance from your office is so urgent. Notably, the Project TENDR scientists call for an "overhaul" in how the government assesses risks to human health from chemical exposures, and emphasize the need "to follow scientific guidance for assessing how chemicals affect brain development, such as taking into account the special vulnerabilities of the developing fetus and children, cumulative effects resulting from combined exposures to multiple toxic chemicals and stressors, and the lack of a safety threshold for many of these chemicals," as advised by the NAS in 2009. We encourage you to act to provide strong scientific advice that will help follow up on this important statement of the need, in 2016, to finally implement the scientific advice EPA received at the start of this Administration, over 7 years ago.

Thank you for your time and consideration of these matters. Please feel free to contact any of us if we can provide additional information or assist with any other follow up from our meeting.

Sincerely,



Veena Singla
Staff Scientist
Natural Resources Defense Council

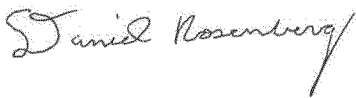


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Enc:

Scientists (NRDC) *et al.* 2016 Comments
Earthjustice 2016 Comments and select attachments
Project TENDR Consensus Statement